

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE	)	
	)	
ALEXANDER E. JONES	)	CASE NO. 22-33553
	)	
DEBTOR.	)	(CHAPTER 11)
	)	
	)	JUDGE CHRISTOPHER M. LOPEZ

**EIGHTH MONTHLY FEE STATEMENT OF CROWE & DUNLEVY, P.C. FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS  
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM  
SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

<b>Name of Applicant:</b>	Crowe & Dunlevy, P.C.	
<b>Applicant's Role in Case:</b>	Co-Counsel to Debtor	
<b>Date Order of Appointment Signed:</b>	January 20, 2023 (Dkt #104)	
	<b>Beginning of Period</b>	<b>End of Period</b>
<b>Time Period Covered in Statement:</b>	09/01/2023	09/30/2023
<b>Summary of Total Fees and Expenses Requested</b>		
<b>Total Fees Requested in this Statement:</b>	\$170,632.80 <sup>1</sup> (80% of \$213,291.00)	
<b>Total Reimbursable Expenses Requested in this Statement:</b>	\$5,012.57 <sup>2</sup>	
<b>Summary Attorney Fees for the Period Covered by this Statement</b>		
<b>Attorneys Fees in this Statement:</b>	\$213,291.00	
<b>Total Actual Attorneys Hours Covered by this Statement:</b>	436.00	
<b>Average Hourly Rate for Attorneys:</b>	\$454.75	
<b>Summary Paraprofessional Fees for the Period Covered by this Statement</b>		
<b>Paraprofessional Fees Requested in this Statement:</b>	\$15,018.00	
<b>Total Actual Paraprofessional Hours Covered by this Statement:</b>	54.6	
<b>Average Hourly Rate for Paraprofessionals:</b>	\$275.05	

<sup>1</sup> Counsel is holding \$0.00 as a retainer in its IOLTA Account which is included in this fee/expense request.

<sup>2</sup> The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

**In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.**

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Crowe & Dunlevy, P.C. (“C&D”), as co-counsel to the Debtor, hereby files its *Eighth Monthly Fee Statement of Crowe & Dunlevy, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from September 1, 2023 through September 30, 2023* (the “Monthly Fee Statement”).

### **RELIEF REQUESTED**

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, C&D seeks interim payment of \$170,632.80 (80% of \$213,291.00) as compensation for professional services rendered to the Debtor during the period from September 1, 2023 through September 30, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$5,012.57, for a total amount of \$175,645.37 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, C&D submits a *Summary of Expenses for the Fee Period*, attached hereto as Exhibit A, a *Summary of Legal Fees by Category as Counsel*

*for the Fee Period, attached as **Exhibit B**, and a Detailed Record of Fees as Co-Counsel for the Fee Period, attached hereto as **Exhibit C**.*

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, [sjordan@jhwclaw.com](mailto:sjordan@jhwclaw.com))
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov), [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)
- c. Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; [dzensky@akingump.com](mailto:dzensky@akingump.com), [mbrimmage@akingump.com](mailto:mbrimmage@akingump.com), [sbrauner@akingump.com](mailto:sbrauner@akingump.com), [melanie.miller@akingump.com](mailto:melanie.miller@akingump.com))
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, [ASterling@koskoff.com](mailto:ASterling@koskoff.com)) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com), [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com))
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, [avi.moshenberg@mhllp.com](mailto:avi.moshenberg@mhllp.com)) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, [Jarrod.Martin@chamberlainlaw.com](mailto:Jarrod.Martin@chamberlainlaw.com))
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, C&D submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. C&D reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, C&D respectfully submits support for its fees in the amount of \$213,291.00 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$5,012.57 for reasonable, actual and necessary expenses incurred during the Fee Period. C&D further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to C&D the amount of \$175,645.37 which is equal to the sum of 80% of C&D's fees and 100% of C&D's expenses incurred during the Fee Period.

Houston, TX  
Dated: November 14, 2023

**CROWE & DUNLEVY, P.C.**

By: /s/ Christina W. Stephenson  
Vickie L. Driver  
State Bar No. 24026886  
Christina W. Stephenson  
State Bar No. 24049535  
2525 McKinnon St., Suite 425  
Dallas, TX 75201  
Telephone: 737.218.6187  
Email: dallaseservice@crowedunlevy.com

**ATTORNEYS FOR DEBTOR ALEXANDER  
E. JONES**

## CERTIFICATE OF SERVICE

I certify that on November 14, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, [sjordan@jhwclaw.com](mailto:sjordan@jhwclaw.com))
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov), [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)
- c. Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; [dzensky@akingump.com](mailto:dzensky@akingump.com), [mbrimmage@akingump.com](mailto:mbrimmage@akingump.com), [sbrauner@akingump.com](mailto:sbrauner@akingump.com), [melanie.miller@akingump.com](mailto:melanie.miller@akingump.com))
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, [ASterling@koskoff.com](mailto:ASterling@koskoff.com)) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com), [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com))
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, [avi.moshenberg@mhillp.com](mailto:avi.moshenberg@mhillp.com)) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, [Jarrod.Martin@chamberlainlaw.com](mailto:Jarrod.Martin@chamberlainlaw.com))
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson  
Christina W. Stephenson

**EXHIBIT “A”**

**SUMMARY OF EXPENSES FOR THE FEE PERIOD**

<b>EXPENSE</b>	<b>TOTAL</b>
Lodging/Travel/Meals	<b>4,670.57</b>
Texas SOS online charge	<b>1.00</b>
Express Courier Charges	<b>341.00</b>

**EXHIBIT "B"****SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY  
FOR THE FEE PERIOD**

<b><u>CATEGORIES</u></b>	<b><u>ATTORNEY TIME</u></b>	<b><u>PARALEGAL TIME</u></b>
B110 Case Administration	15.1	7.7
B120 Asset Analysis and Recovery	33.0	0.00
B130 Asset Disposition	3.3	0.00
B140 Relief from Stay/Adequate Protection	1.1	0.00
B150 Meetings of & Communications with Creditors	0.00	0.0
B160 Fee/Employment Applications	9.4	22.1
B170 Fee/Employment Objections	0.00	0.00
B180 Avoidance Action Analysis	0.00	0.00
B185 Assumption/Rejection of Executory Contracts	5.1	0.8
B190 Other Contested Matters	319.10	14.5
B195 Non-Working Travel	18.1	0.00
B210 Business Operations	23.5	2.4
B220 Employee Benefits/Pensions	0.00	0.00
B230 Financing/Cash Collections	0.00	0.5
B240 Tax Issues	0.00	0.00
B250 Real Estate	0.00	0.00
B260 Board of Directors Matters	0.00	0.00
B310 Claims Administration and Objections	0.00	6.6
B320 Plan and Disclosure Statement	8.3	0.00
B410 General Bankruptcy Advice/Opinions	0.00	0.00
B420 Restructurings	0.00	0.00
<b>TOTALS:</b>	<b>436.00</b>	<b>54.6</b>

**EXHIBIT “C”**

**DETAILED RECORD OF FEES FOR THE FEE PERIOD**



**CROWE&DUNLEVY**  
ATTORNEYS AND COUNSELORS AT LAW

**2525 MCKINNON, SUITE 425  
DALLAS, TX 75201  
(214) 420-2163  
TAX I.D. NUMBER 73-1055796**

October 31, 2023  
Invoice # 765083

Alex "AJ" Jones  
ATTN: Shelby A. Jordan  
6207 Bee Cave Road, Suite 120  
Austin, TX 78746

Responsible Attorney  
Vickie L. Driver

Client # 50134  
Matter # 00802

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### **INVOICE SUMMARY**

Current Invoice Total Fees	\$213,291.00
Current Invoice Total Expenses	\$5,012.57
<b>Current Invoice Total</b>	<b>\$218,303.57</b>

### *Payment Instructions*

Check Remittance:

Credit Card Remittance:

Wire Remittance:

Mail To:  
Crowe & Dunlevy  
Braniff Building  
324 N. Robinson Ave., Ste. 100  
Oklahoma City, OK 73102

<https://www.crowedunlevy.com/makeapayment/>

Bank Name: BancFirst  
Routing #103003632  
Oklahoma City, OK 73102  
Account Name: Crowe & Dunlevy  
Account Number 4025023715  
Swift Code BFOCUS44

*Please refer to Invoice # 765083 and any other invoice numbers being paid on your remittance.*

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 Responsible Attorney  
 Vickie L. Driver

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**SUMMARY OF PREVIOUS UNPAID INVOICES**

<u>Invoice Number</u>	<u>Invoice Date</u>	<u>Amount Billed</u>	<u>Credits Applied</u>	<u>Balance Due</u>
761699	06/30/2023	341,921.51	0.00	341,921.51
761700	07/31/2023	214,254.82	0.00	214,254.82
761710	05/31/2023	185,862.13	-8,891.79	176,970.34
761722	08/31/2023	493,188.66	0.00	493,188.66
763441	09/29/2023	320,869.84	0.00	320,869.84
<b>TOTALS:</b>		<b>\$1,556,096.96</b>	<b>\$-8,891.79</b>	<b>\$1,547,205.17</b>

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09/01/2023	V. Driver	B110/	Calls with client regarding case matters.	0.50
09/01/2023	V. Driver	B140/	Emails regarding stay relief and continuing trial date.	0.30
09/01/2023	V. Driver	B190/	Review email from FSS CRO on refusal to give assistant to be terminated notice (.2); send email to R. Battaglia clarifying that timing on FSS filing the motion to employ the contract is not restricted by AJ legal team (.3); call with FSS regarding attempts to stem the admin expense claim if terminated FSS employee sues (.5).	1.00
09/01/2023	V. Driver	B190/	Emails regarding production scheduling and completion.	0.20
09/01/2023	V. Driver	B210/	Emails regarding Alex related URLs. (.2); emails regarding mediation discussion (.2).	0.40
09/01/2023	D. Harlan	B190/	Performed document review.	6.00
09/01/2023	K. Kinser	B190/	Perform document review.	8.80
09/01/2023	E. Weaver	B160/	Revisions to Rachel Kennerly's monthly fee statement for May and June (.5); email correspondence to and from Rachel Kennerly regarding July time (.2).	0.70

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 Responsible Attorney  
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09/01/2023	E. Weaver	B160/	Continue drafting spreadsheet of professional fees for all estate and UCC professionals.	2.00
09/01/2023	E. Weaver	B160/	Docket objection deadline for fifth, sixth and seventh monthly fee statements of Crowe & Dunlevy and fifth and sixth monthly fee statements of BlackBriar Advisors (.2); docket extended 2004 production request deadline (.2).	0.40
09/01/2023	E. Weaver	B190/	Email correspondence to team regarding powerpoint slide deck.	0.20
09/02/2023	D. Harlan	B190/	Perform document review.	8.60
09/03/2023	D. Harlan	B190/	Perform document review.	5.80
09/04/2023	V. Driver	B160/	Call with N. Pattis about payment (.3); emails regarding payment to N. Pattis (.2).	0.50
09/04/2023	V. Driver	B190/	Emails on 2004 limits for AJ examination.	0.20
09/04/2023	D. Harlan	B190/	Perform document review.	4.30
09/05/2023	L. Dauphin	B190/	Access online repository and prepare third party productions for attorney discovery review.	1.20
09/05/2023	V. Driver	B190/	Review 2004 exam notice.	0.30
09/05/2023	V. Driver	B195/	Travel to Austin for deposition (billed at half time 3.0).	1.50

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09/05/2023	D. Harlan	B190/	Perform document review.	1.60
09/05/2023	D. Harlan	B190/	Redact documents for document review.	3.20
09/05/2023	J. Yoon	B190/	Email UCC's counsel regarding Rule 2004 deposition transcripts of Patrick Riley.	0.20
09/06/2023	L. Dauphin	B190/	Prepare third party productions received from Akin and Scott Douglas for attorney review.	1.30
09/06/2023	V. Driver	B120/	Emails seeking clarification on 2017 watch report to current valuepro's appraisal.	0.30
09/06/2023	V. Driver	B140/	Continuation of emails on rescheduling Texas trial.	0.20
09/06/2023	V. Driver	B160/	Circulating interim monthly fee statements.	0.10
09/06/2023	V. Driver	B190/	Preparation for and attend E. Jones 2004 examination (7.4); discuss examination with client (.6); emails regarding review protocol for texts (.2).	8.20
09/06/2023	V. Driver	B210/	Emails regarding issues on budget.	0.40
09/06/2023	D. Harlan	B190/	Perform document review.	8.60
09/06/2023	K. Kinser	B190/	Perform document review.	7.30
09/06/2023	C. Stephenson	B110/	Draft response to press inquiry.	1.20
09/06/2023	C. Stephenson	B190/	Review and respond to personal property inquiry from creditor.	0.70

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 Responsible Attorney  
 Vickie L. Driver

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09/06/2023	E. Weaver	B110/	Procure appraisal report and premarital agreement and circulate to team.	0.20
09/06/2023	E. Weaver	B110/	Electronic case file management.	2.20
09/06/2023	E. Weaver	B190/	Review the UCC's notice of rescheduled rule 2004 deposition of Joseph Dalessio and continuance of rule 2004 deposition of David Jones and docket same.	0.40
09/07/2023	L. Dauphin	B190/	Continue to prepare third party productions received from Akin for attorney review.	3.50
09/07/2023	V. Driver	B110/	Meeting with client regarding various case status issues.	1.00
09/07/2023	V. Driver	B190/	Emails with group regarding logistics for AJ 2004 examination.	0.20
09/07/2023	V. Driver	B190/	Emails with N. Pattis on payment owed and status of appeal.	0.40
09/07/2023	V. Driver	B195/	Travel from Austin home (billed at half time 3.0).	1.50
09/07/2023	D. Harlan	B190/	Research privilege issues.	1.60
09/07/2023	D. Harlan	B190/	Perform document review.	7.30
09/07/2023	K. Kinser	B190/	Perform document review.	3.20
09/07/2023	C. Stephenson	B320/	Perform and analyze research for plan of reorganization.	3.80

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09/07/2023	E. Weaver	B190/	Review the UCC's notice of continued rule 2004 deposition of David Jones and the Texas Plaintiff's amended notice of 2004 deposition of David Jones and docket same (.2); review the UCC's notice of postponed 2004 examination of Robert Schleizer and docket same (.1).	0.30
09/08/2023	L. Dauphin	B190/	Prepare supplemental document production.	0.90
09/08/2023	V. Driver	B190/	Call with L. Dauphin on document production issues (.3); review documents for production (.8); emails with UCC on document production status (.2).	1.30
09/08/2023	D. Harlan	B190/	Perform document review.	6.80
09/08/2023	D. Harlan	B190/	Work on privilege memo.	0.70
09/08/2023	K. Kinser	B190/	Perform document review.	7.40
09/08/2023	C. Stephenson	B320/	Perform and analyze research regarding disposable income issue for plan of reorganization (2.2); draft related correspondence (.8).	3.00
09/09/2023	D. Harlan	B190/	Perform document review.	9.80
09/10/2023	V. Driver	B190/	Call with UCC on examination issues.	0.40

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09/10/2023	V. Driver	B195/	Travel to Austin for 2004 exam preparation (billed at half time 3.0).	1.50
09/10/2023	D. Harlan	B190/	Perform document review.	11.60
09/11/2023	V. Driver	B110/	Meet with client regarding ROR response structure and references (1.3); meeting with S. Jordan discussing response to ROR (.4).	1.70
09/11/2023	V. Driver	B110/	Meetings with client on general case status.	0.90
09/11/2023	V. Driver	B190/	Meeting(s) with client to prepare for 2004 examination.	5.70
09/11/2023	V. Driver	B190/	Preparation for 2004 examination.	2.10
09/11/2023	V. Driver	B190/	Address questions related to document review and privilege issues.	0.60
09/11/2023	D. Harlan	B190/	Perform document review.	9.60
09/11/2023	K. Kinser	B110/	Perform document review.	2.00
09/11/2023	C. Stephenson	B190/	Client meeting for deposition prep (2.2); meeting with financial advisor regarding same (1.1); additional deposition preparation (1.6).	4.90
09/11/2023	C. Stephenson	B195/	Travel to Austin for client deposition billed at half-time (4.0).	2.00
09/11/2023	E. Weaver	B110/	Review and revise list of upcoming deadlines.	0.60

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09/11/2023	E. Weaver	B190/	Attention to letter from Gus Oppermann requesting supplemental clerk's record to be filed with the court of appeals in state court action pending in Travis County and circulate same to team.	0.20
09/12/2023	L. Dauphin	B190/	Create additional document assignment groups.	0.10
09/12/2023	V. Driver	B140/	Emails regarding lift stay extension with Texas plaintiffs.	0.20
09/12/2023	V. Driver	B185/	Emails regarding ESG issues, potential resolution.	0.90
09/12/2023	V. Driver	B190/	Meet with client to prepare for second half of 2004 exam.	1.10
09/12/2023	V. Driver	B190/	Preparation for and attend 2004 exam of client.	5.10
09/12/2023	K. Kinser	B190/	Perform document review.	1.70
09/12/2023	C. Stephenson	B190/	Attend deposition of A. Jones and related client meetings (5.2); draft and revise response to reservation of rights (2.4).	7.60
09/12/2023	E. Weaver	B110/	Compile upcoming dates and deadlines (.3); email correspondence to Bob Schleizer with upcoming 2004 deposition dates and hearings (.2).	0.50
09/12/2023	E. Weaver	B160/	Review updated spreadsheet received from Blackbriar Advisors and revise seventh monthly fee statement to include August time.	1.40

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Vickie L. Driver

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09/13/2023	V. Driver	B140/	Discuss extension of trial to accommodate pretrial extension with Texas counsel.	0.40
09/13/2023	V. Driver	B190/	Meeting with Sub V trustee and client.	1.40
09/13/2023	V. Driver	B190/	Attend 2004 examination and preparation before (4.9); meetings with client following 2004 exam (.9).	5.80
09/13/2023	V. Driver	B210/	Meet with T. Wolff on bourbon contract and have same executed and sent to SubV Trustee and FSS. (.7) Meeting with UCC following 2004 exam. (.5)	1.20
09/13/2023	D. Harlan	B190/	Perform document review.	7.80
09/13/2023	K. Kinser	B190/	Perform document review.	6.30
09/13/2023	C. Stephenson	B190/	Draft and revise response to Reservation of Rights (4.3); review and respond to related correspondence (1.3).	5.60
09/13/2023	E. Weaver	B160/	Draft professional fee statement spreadsheet.	4.20
09/14/2023	V. Driver	B110/	Review and revise ROR response (1.5); calls with client finalizing ROR response (.6).	2.10
09/14/2023	V. Driver	B185/	Work to finalize ESG settlement.	0.80
09/14/2023	V. Driver	B195/	Travel to Dallas from Austin (3.6 - billed at half-time).	1.80

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Responsible Attorney  
Vickie L. Driver

Post - petition

09/14/2023	V. Driver	B210/	Emails extending objection deadlines on admin claim and employee motion.	0.20
09/14/2023	D. Harlan	B120/	Perform asset recovery research.	7.60
09/14/2023	D. Harlan	B190/	Perform document review.	2.40
09/14/2023	C. Stephenson	B195/	Travel from Austin to Dallas (billed at half-time).	2.00
09/14/2023	E. Weaver	B160/	Revise professional fee statement spreadsheet (3.5); email correspondence to Shelby Jordan's office and Rachel Kennerly's office to confirm initial retainer received (.3).	3.80
09/14/2023	E. Weaver	B190/	Review agreed order on motion for approval of compromise and settlement and docket date consensual agreement due and date automatic shall lift to allow pre-trial proceedings.	0.40
09/14/2023	E. Weaver	B190/	Review notice of relocated deposition of Joseph Dalessio and docket same.	0.20
09/15/2023	L. Dauphin	B190/	Prepare discovery for attorney production review.	1.20
09/15/2023	V. Driver	B120/	Analyze issues relating to estate assets for individuals in Bankruptcy.	1.10
09/15/2023	V. Driver	B190/	Emails scheduling meeting with Sub V trustee.	0.30
09/15/2023	V. Driver	B190/	Emails regarding resetting R. Schleizer deposition.	0.30

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09/15/2023	V. Driver	B210/	Emails and calls related to ESG settlement.	1.10
09/15/2023	D. Harlan	B120/	Draft asset recovery memo.	9.50
09/15/2023	D. Harlan	B190/	Perform document review.	2.60
09/15/2023	K. Kinser	B190/	Correspondence regarding production.	0.10
09/15/2023	C. Stephenson	B190/	Review and analyze research regarding contested budget issues (1.6); draft and review related correspondence (1.3).	2.90
09/15/2023	E. Weaver	B160/	Revise, finalize and file seventh monthly fee statement for BlackBriar Advisors (.6); serve same via email to the notice parties (.2).	0.80
09/16/2023	D. Harlan	B190/	Perform document review.	11.20
09/17/2023	D. Harlan	B190/	Perform document review.	11.40
09/18/2023	V. Driver	B185/	Review and revise release on ESG and send to group for review (.4); review and analyze stipulation incorporating release terms and approve same (.3); emails and calls seeking approval of ESG stipulation for filing (.4).	1.10
09/18/2023	V. Driver	B190/	Review and revise ROR response and prepare for filing (1.6); communication with client regarding same (.2).	1.80
09/18/2023	D. Harlan	B120/	Work on asset recovery memo.	2.60

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09/18/2023	D. Harlan	B130/	Proof, edit and fix cities on sale motion.	1.60
09/18/2023	D. Harlan	B190/	Perform document review.	7.40
09/18/2023	C. Stephenson	B190/	Review and respond to Youngevity counsel regarding 2004 production.	0.80
09/18/2023	C. Stephenson	B190/	Draft and revise Response and Objection to Reservation of Rights (2.8); review and respond to related correspondence (.8).	3.60
09/18/2023	C. Stephenson	B210/	Draft joint mutual release document.	1.70
09/18/2023	E. Weaver	B110/	Review spreadsheet received from BlackBriar Advisors and draft August monthly operating report (2.0); telephone call with Bob Schleizer and Kathy Norderhaug regarding professional fee schedule (.2).	2.20
09/18/2023	E. Weaver	B190/	Review email communications from Eric Awerbuch with Emord & Associates regarding Youngevity's written response and responsive documents to 2004 request (.2); forward fileshare link to Eric to share documents (.2); telephone call with Eric regarding access (.1); upload same to Litshare and Everlaw (.5).	1.00
09/19/2023	V. Driver	B110/	Review and respond to press inquiry.	0.30

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09/19/2023	V. Driver	B120/	Analyze issues with press coverage and misstatement of liability.	0.30
09/19/2023	V. Driver	B190/	Attend deposition of Joey DeLassio.	2.00
09/19/2023	V. Driver	B210/	Review and approve changes to stipulation with ESG on Platinum monies.	0.30
09/19/2023	D. Harlan	B190/	Perform document review.	5.60
09/19/2023	D. Harlan	B190/	Perform text document review.	9.50
09/19/2023	C. Stephenson	B120/	Draft correspondence regarding potential claims.	1.30
09/19/2023	C. Stephenson	B185/	Perform analysis and review correspondence regarding ESG contract issues.	1.70
09/19/2023	E. Weaver	B110/	Revise, finalize and file August monthly operating report.	2.00
09/19/2023	E. Weaver	B160/	Draft July monthly fee statement for Rachel Kennerly.	1.00
09/20/2023	D. Harlan	B120/	Draft asset recovery memo.	3.50
09/20/2023	D. Harlan	B190/	Perform document review.	9.40
09/20/2023	C. Stephenson	B190/	Review and respond to research correspondence regarding various contested matters.	1.30
09/20/2023	C. Stephenson	B210/	Review and revise stipulation (.6); review and draft related correspondence (1.6).	2.20

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09/20/2023	E. Weaver	B160/	Revise, finalize and file third monthly fee statement for Rachel Kennerly (1.0); serve same via email to the notice parties (.2).	1.20
09/20/2023	E. Weaver	B210/	Revise and finalize joint stipulation and agreed order resolving distribution of Platinum Products sales proceeds and file in both the AEJ and FSS cases.	1.40
09/21/2023	V. Driver	B210/	Calls and emails with FSS counsel, Sub V Trustee, FSS controller, and client on FSS' DIP account closure and resolving same (2.2); calls and emails with CLO for Axos Bank on reopening accounts (.7); review and revise motion for sanctions for willful violation of the stay and order granting same (.8); call and email with court seeking time for emergency hearing and informing them of resolution of issue (.4).	4.10
09/21/2023	D. Harlan	B120/	Draft asset recovery memo.	5.30
09/21/2023	D. Harlan	B190/	Perform document review.	0.60
09/21/2023	D. Harlan	B190/	Finishing doc review for leftover trust docs.	0.10
09/21/2023	D. Harlan	B210/	Obtaining contact information for executives of Axis Bank to forward potential motion.	0.10

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09/21/2023	C. Stephenson	B110/	Review and respond to media inquiry.	0.90
09/21/2023	C. Stephenson	B210/	Draft Emergency Motion to Enforce the Automatic Stay regarding Axios Bank (1.7); draft proposed order regarding same (.5).	2.20
09/21/2023	E. Weaver	B210/	Revise joint emergency motion to enforce the automatic stay and request for damages for willful stay violations in FSS case.	1.00
09/22/2023	V. Driver	B190/	Preparation for call with UCC on outstanding discovery issues (.7); attend call with UCC counsel on discovery issues (.8).	1.50
09/22/2023	V. Driver	B210/	Emails with co-counsel on employment contract and admin claim.	0.80
09/22/2023	D. Harlan	B190/	Discovery call with Vickie L. Driver and Akin Gump.	1.10
09/22/2023	D. Harlan	B190/	Perform document review.	5.70
09/22/2023	E. Weaver	B160/	Revise professional fee statement to include Martin, Disiere, the Reynal firm and Teneo Capital, LLC numbers.	2.80
09/25/2023	V. Driver	B190/	Emails on discovery follow ups and working to resolve same (.8); review and analyze further review documents and items in discovery (1.6).	2.40

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09/25/2023	V. Driver	B210/	Emails seeking meetings to resolve FSS issues (.4); review 16th CCO and send comments to same (.4).	0.80
09/25/2023	D. Harlan	B120/	Draft MOR-related memo.	1.50
09/25/2023	E. Weaver	B160/	Revise professional fee statement spreadsheet.	3.10
09/25/2023	E. Weaver	B190/	Review the UCC's second notice of rule 2004 requests to Coinbase and docket deadline for same.	0.20
09/25/2023	E. Weaver	B230/	Review FSS's sixteenth interim cash collateral order and docket hearing date for same.	0.30
09/26/2023	V. Driver	B195/	Travel from Houston to Austin for client meeting (billed at half time 3.0).	1.50
09/26/2023	V. Driver	B210/	Preparation for and attend hearing on cash collateral for FSS and related case issues (1.2); meeting with FSS counsel on Axos bank issues and other DIP banks (.3); meeting with SubV Trustee and FSS on issues with plan revision and confirmation and employment agreement and admin claim (.8).	2.30
09/26/2023	V. Driver	B320/	Analyze issues with plan terms.	1.50
09/26/2023	D. Harlan	B110/	Review MORs.	0.40
09/26/2023	D. Harlan	B190/	Draft privilege log.	2.20

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09/26/2023	D. Harlan	B190/	Draft Suggestion of Bankruptcy.	0.90
09/26/2023	D. Harlan	B195/	Travel to Austin to meet with Alex Jones and Vickie L. Driver (billed at half time - 4.6 hours).	2.30
09/26/2023	D. McClellan	B190/	Call to discuss status of adversary proceeding.	0.50
09/26/2023	E. Weaver	B160/	Review sixth monthly fee statement of Teneo Capital, LLC and docket objection deadline for same.	0.20
09/26/2023	E. Weaver	B190/	Coordinate with and various telephone calls and correspondence to Esquire to obtain Vol. 1 and 2 of the Alex Jones transcripts from his 2004 examination.	1.40
09/26/2023	E. Weaver	B230/	Review agenda for FSS's cash collateral hearing and circulate to team.	0.20
09/27/2023	V. Driver	B110/	Meetings with client to update on all case matters.	1.40
09/27/2023	V. Driver	B130/	Review and revise Motion to Sell Personal Property (.8); emails with committee on sale motion modifications (.6); review personal property to be sold (.3).	1.70
09/27/2023	V. Driver	B185/	Emails with UCC seeking hearing on motion to reject ESG.	0.40
09/27/2023	V. Driver	B190/	Work on document discovery issues (1.3); emails on deposition scheduling (.2).	1.50

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09/27/2023	V. Driver	B210/	Review stipulation as filed and send to FSS for inclusion in Thursday AP run.	0.30
09/27/2023	V. Driver	B210/	Review and analyze UCC comments to employment agreement and admin claim motion and send response to FSS counsel (.8); discuss same with FSS counsel (.4); review and analyze budget expenditures and revenue (.7).	1.90
09/27/2023	D. Harlan	B110/	Meeting with client to update on all case matters.	0.80
09/27/2023	D. Harlan	B110/	Meeting with client and Blackbriar to update on case matters.	0.50
09/27/2023	D. Harlan	B190/	Draft Suggestion of Bankruptcy for FSS and review trust documents.	0.60
09/27/2023	D. Harlan	B190/	Draft privilege log.	0.60
09/27/2023	D. Harlan	B190/	Perform document review.	5.30
09/27/2023	E. Weaver	B160/	Email correspondence with Lori Hanes in Chris Martin's office regarding invoices/fee statements and retainer.	0.50
09/27/2023	E. Weaver	B185/	Review case docket for objections/responses to motion to reject executory contracts and circulate to team.	0.80
09/27/2023	E. Weaver	B310/	Review claims register and draft reconciliation spreadsheet against schedules.	4.20

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09/28/2023	V. Driver	B110/	Calls with client on case.	0.60
09/28/2023	V. Driver	B185/	Emails with UCC counsel on setting ESG motion to reject for hearing.	0.20
09/28/2023	V. Driver	B190/	Review documents marked for further review (1.7); emails regarding document review on additional email account (.2); scheduling meeting with Sub V and client (.2).	2.10
09/28/2023	V. Driver	B195/	Travel from Austin (3.6 billed at half time).	1.80
09/28/2023	V. Driver	B210/	Meetings with client and BBA.	2.10
09/28/2023	D. Harlan	B190/	Reviewing MOR documents and creating chart.	2.50
09/28/2023	D. Harlan	B190/	Perform document review.	8.80
09/28/2023	D. Harlan	B195/	Travel from Austin to DFW (11:30 AM - 4:00 PM) (Billed at half time - 4.5 hrs).	2.20
09/28/2023	C. Stephenson	B160/	Review and revise billing statement (2.3); draft related correspondence (.6).	2.90
09/28/2023	C. Stephenson	B190/	Review and analyze deposition testimony (3.8); draft related correspondence (.8).	4.60
09/28/2023	E. Weaver	B190/	Review UCC's notice of rule 2004 requests to Binance and Krake and docket deadlines for same.	0.30
09/28/2023	E. Weaver	B310/	Review claims register and begin downloading claims.	2.40

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09/29/2023	L. Dauphin	B190/	Apply payment to upgrade Proton email account (.2); prepare email collected by Digital Mountain for attorney production review (.1).	0.30
09/29/2023	L. Dauphin	B190/	Prepare supplemental client document production.	1.40
09/29/2023	V. Driver	B160/	Review and approve monthly fee statement for filing.	0.30
09/29/2023	V. Driver	B190/	Emails with UCC and team on discovery issues.	2.10
09/29/2023	V. Driver	B210/	Call and emails with L. Freeman on FSS issues (1.1); call with FSS counsel on same (.3).	1.40
09/29/2023	D. Harlan	B190/	Perform document review.	9.20
09/29/2023	D. Harlan	B190/	Draft Suggestion of Bankruptcy.	0.70
09/29/2023	C. McDonald	B190/	Review terms of AEJ 2018 Trust (.3); email correspondence (.6).	0.90
09/29/2023	C. Ottaway	B190/	Review 2018 trust (.2); discuss power of court order (.4).	0.60
09/29/2023	C. Stephenson	B160/	Draft and revise Eighth Statement of Interim Compensation (1.7); review spreadsheet data (1.3); draft exhibits to same (1.8); file and serve statement (.8).	5.60
09/29/2023	J. Yoon	B190/	Analyze and review Youngevity's objections and responses to debtor's request for production under rule 2004 (1.5); draft email analysis of the same for discovery issues (1.2).	2.70

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09/30/2023	V. Driver	B110/	Calls with client on current issues in case and budgeting.	0.80
09/30/2023	D. Harlan	B190/	Perform document review.	8.30
			Total Hours	490.60
Total Fees for this Invoice				\$213,291.00

## SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B110	22.80	12,212.50	Bankruptcy - Case Administration
B120	33.00	10,681.00	Bankruptcy - Asset Analysis and Recovery
B130	3.30	1,799.50	Bankruptcy - Asset Disposition
B140	1.10	874.50	Bankruptcy - Relief from Stay/Adequate Protection Proceedings
B160	31.50	13,312.50	Bankruptcy - Fee/Employment Applications
B185	5.90	4,154.50	Bankruptcy - Assumption/Rejection of Leases and Contracts
B190	333.60	131,504.50	Bankruptcy - Other Contested Matters (excluding assumption/rejection motions)
B195	18.10	11,752.00	Bankruptcy - Non-Working Travel
B210	25.90	18,851.00	Bankruptcy - Business Operations

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## SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B230	0.50	147.50	Bankruptcy - Financing/Cash Collections
B310	6.60	1,947.00	Bankruptcy - Claims Administration and Objections
B320	8.30	6,054.50	Bankruptcy - Plan and Disclosure Statement (including Business Plan)
Total	<u><u>490.60</u></u>	<u><u>\$213,291.00</u></u>	

09/05/2023	McClellan, Deric reimbursement of travel expenses to Houston Texas to attend Motion for Summary Judgment Hearing regarding Alex Jones 8/13-16/2023; transportation \$ 663.83, lodging \$ 817.33 and meals \$ 86.29	\$1,567.45
09/05/2023	Davis , Chris reimbursement of travel expenses to Houston Texas to attend Motion for Summary Judgment Hearing regarding Alex Jones 8/13-16/2023; 980 miles x .655/mile= \$ 641.90, lodging \$ 1383.24, conference room \$ 500.00, tolls \$ 26.00, valet and hotel tips \$ 60.00 and meals 212.41	2,849.55
09/07/2023	Payment to Special Delivery Service for professional services rendered regarding invoice 699478	341.00
09/12/2023	Texas Secretary of State Online Charge 8/1-31/2023	1.00
09/14/2023	Stephenson, Christina reimbursement of travel expenses to Austin Texas for depositions 9/10-14/2023; transportation \$ 149.45 and meals \$ 104.12	253.57
	Subtotal of Expenses	\$5,012.57
	Subtotal of Costs	\$0.00
	Total Expenses and Costs for this Invoice	\$5,012.57

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## SUMMARY OF DISBURSEMENTS

Task Code	Amount	Task Description
E110	4,670.57	Out-of-town travel
E112	1.00	Court fees
E123	341.00	Other professionals
Total	<u><u>\$5,012.57</u></u>	

Total For This Invoice	<u><u>\$218,303.57</u></u>
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## SUMMARY OF FEES

Name	Hours Worked	Hourly Rate	Bill Amount
C. Ottaway	0.60	525.00	315.00
L. Dauphin	9.90	185.00	1,831.50
D. McClellan	0.50	310.00	155.00
K. Kinser	36.80	285.00	10,488.00
V. Driver	94.50	795.00	75,127.50
C. Stephenson	62.50	715.00	44,687.50
E. Weaver	44.70	295.00	13,186.50
C. McDonald	0.90	255.00	229.50
J. Yoon	2.90	285.00	826.50
D. Harlan	237.30	280.00	66,444.00
Total	<u><u>490.60</u></u>		<u><u>\$213,291.00</u></u>